

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

CRIMINAL DOCKET NO.: 07-105

VERSUS

SECTION: "R" (3)

EDWIN JUBENCIO SALINAS

FACTUAL BASIS

If this case were to proceed to trial, the Government would prove the Defendant guilty beyond a reasonable doubt of Count One of the Indictment. In that Count, the Defendant, **EDWIN JUBENCIO SALINAS**, is charged with knowingly and intentionally combining, conspiring, confederating, and agreeing with one or more persons to distribute and possess with the intent to distribute five (5) or more kilograms of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A)(ii). The Government would establish, among others, the following examples of **SALINAS**'s involvement in the conspiracy through reliable and competent evidence:

- 1.) Beginning at a time unknown, but prior to July 25, 2006, and continuing until on or about February 19, 2007, in the Eastern District of Louisiana, **SALINAS** participated in a drug organization that conspired to obtain and distribute between fifteen (15) kilograms and fifty (50) kilograms of cocaine hydrochloride (“cocaine”) and over one thousand (1000) pounds of marijuana during the conspiracy. This organization utilized cocaine and marijuana brought into Louisiana from Texas through **SALINAS**’s co-defendant and brother-in-law, Gabriel Juron **BOLDEN**.
- 2.) During the conspiratorial period charged in the indictment, **SALINAS** directly assisted with the transportation of cocaine and marijuana from Houston, Texas to Slidell, Louisiana. As a routine matter, **SALINAS**, **BOLDEN**, and at least one additional co-conspirator would travel to Houston as a group for the purpose of obtaining cocaine and marijuana. Approximately every ten (10) to fourteen (14) days, **SALINAS** and his co-conspirators would travel to Houston and obtain between three (3) and five (5) kilograms of cocaine and one hundred (100) pounds or more of marijuana.
- 3.) On January 26, 2007, a court-authorized Title III wire intercept was initiated on a cellular telephone used by **BOLDEN**. Through that interception, investigators learned that on Saturday, February 10, 2007, at approximately 4:23 p.m., in call session number 3250, **BOLDEN** contacted a source of supply in Houston. During the conversation, **BOLDEN** inquired about obtaining four (4) kilograms of cocaine and two hundred (200) pounds of marijuana. Over a series of ensuing telephone conversations, the details of the narcotics transaction were arranged to take place the following weekend.
- 4.) On Sunday, February 18, 2007, **SALINAS**, **BOLDEN**, co-conspirator Charles Eugene **PREWITT**, and **SALINAS**’s unindicted co-conspirator and sister, Karen J. Bolden, departed Slidell enroute to Houston in order to obtain approximately three (3) kilograms of cocaine and one hundred

(100) pounds of marijuana. **SALINAS** and his co-conspirators obtained the illegal narcotics late in the evening and traveled back to Slidell. At approximately 3:15 a.m. on Monday, February 19, 2007, **SALINAS** and his co-conspirators were arrested by members of the FBI. The FBI seized approximately three (3) kilograms of cocaine and one hundred (100) pounds of marijuana from **SALINAS** and the co-conspirators.

5.) Title III wire intercepts, as well as interviews with **SALINAS** and other co-conspirators, indicated that the organization obtained between fifteen (15) and fifty (50) kilograms of cocaine and over one thousand (1000) pounds of marijuana during the life of the conspiracy. Statements given by **SALINAS** upon arrest verified and corroborated his participation in the conspiracy.

6.) The FBI utilized audio surveillance techniques which captured **SALINAS**'s co-conspirators communicating over various cellular telephones. Intercepted conversations between those individuals would be introduced as evidence, as well as the testimony of cooperating conspirators and investigators.

7.) An employee of the St. Tammany Parish Sheriff's Office analyzed the substances obtained during the investigation which were transported by **SALINAS**. This analysis determined that they were indeed cocaine hydrochloride, a Schedule II narcotic drug controlled substance, and marijuana, a Schedule I controlled substance.

EDWIN JUBENCIO SALINAS acknowledges that the above-referenced conduct constitutes a knowing violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A)(ii). The Government and **SALINAS** agree and stipulate that for sentencing purposes,

the amounts the Government could prove that **SALINAS** distributed and/or possessed with the intent to distribute are forty (40) kilograms of cocaine and one thousand (1000) pounds of marijuana.

APPROVED AND ACCEPTED:

EDWIN JUBENCIO SALINAS (date)
Defendant

MARTIN E. REGAN, JR. (date)
Attorney for Defendant

R. CHRISTOPHER COX III (date)
Assistant United States Attorney